Jonathan L. Flaxer, Esq. (JF 7096)
Janice B. Grubin, Esq. (JG 1544)
GOLENBOCK, EISEMAN, ASSOR & BELL
Attorneys for Debtors and Debtors-in-Possession
437 Madison Avenue
New York, New York 10022
(212) 907-7300

PRESENTMENT DATE: February 21, 2001 TIME: 12:00 noon

NOTICE OF PRESENTMENT OF STIPULATION AND ORDER GRANTING LIMITED RELIEF FROM THE STAY TO ALLOW ANTHONY GOLIA III, LINDA GOLIA, AND LINDA GOLIA AS NATURAL GUARDIAN OF ANTHONY GOLIA IV TO PURSUE LITIGATION

PLEASE TAKE NOTICE that, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), by their attorneys, Golenbock, Eiseman, Assor & Bell, will present the attached proposed stipulation and order for signature to Honorable Stuart M. Bernstein, Chief United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, Room 729, One

Bowling Green, New York, New York 10004-1408, at 12:00 o'clock noon on February 21,

2001.

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the

proposed order must be in writing and shall be filed with the Clerk, United States Bankruptcy

Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York

10004-1408, with copies delivered to Chief Judge Bernstein's chambers and served upon the

undersigned, not later than 11:30 on February 21, 2001.

PLEASE TAKE FURTHER NOTICE that, unless timely objections are filed,

the order may be signed without a hearing.

PLEASE TAKE FURTHER NOTICE that, if timely objections are filed and

served or if the Court so directs, a hearing shall be held before the Honorable Stuart M.

Bernstein, at a date to be scheduled by the Court, upon such additional notice as the Court

may direct.

Dated:

New York, New York February 13, 2001

GOLENBOCK, EISEMAN, ASSOR & BELL

Attorneys for Debtors and Debtors-in-Possession 437 Madison Avenue

New York, New York 10022

(212) 907-7300

By___/s/ Jonathan L. Flaxer

Jonathan L. Flaxer (JF 7096)

A Member of the Firm

TO:

ANNEXED SERVICE LIST

BY MAIL

2

Service List

OFFICE OF THE UNITED STATES TRUSTEE

33 Whitehall Street, 21st Floor New York, New York 10004 Attn: Brian S. Masumoto, Esq.

MORGAN, LEWIS & BOCKIUS, LLP

101 Park Avenue New York, New York 10178 Attn: Richard S. Toder, Esq.

BERLACK, ISRAELS & LIBERMAN

120 West 45th Street
New York, New York 10036
Attn: Edward S. Weisfelner, Esq.

SACKS AND SACKS ESQ. 150 Broadway, 4th Floor New York, New York 10038 (212) 964-5570

Attn: Kenneth Sacks

Document #: 168963